

William Cafaro, Esq.  
Partner  
ADMITTED IN NY, CA, MD & TX  
Email: [bcafaroc@cafaro.esq.com](mailto:bcafaroc@cafaro.esq.com)

Amit Kumar, Esq.  
Managing Attorney  
ADMITTED IN NY & NJ  
Email: [akumar@cafaro.esq.com](mailto:akumar@cafaro.esq.com)

Andrew S. Buzin, Esq.  
Of Counsel  
ADMITTED IN NY, FL & DC



108 West 39<sup>th</sup> Street, Suite 602  
New York, New York 10018  
Telephone: 212.583.7400  
Facsimile: 212.583.7401  
[www.cafaro.esq.com](http://www.cafaro.esq.com)

Louis M. Leon, Esq.  
Associate  
ADMITTED IN NY  
Email: [lleon@cafaro.esq.com](mailto:lleon@cafaro.esq.com)

Matthew S. Blum, Esq.  
Of Counsel  
ADMITTED IN NY  
Email: [mblum@cafaro.esq.com](mailto:mblum@cafaro.esq.com)

June 8, 2021

**Via ECF**

Hon. Loretta A. Preska, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2220  
New York, New York 10007

Re: *Lance Mincey v. 1199/SEIU Greater New York Worker  
Participation Fund, Inc., et al*  
Case No. 21-cv-01070 (LAP)

Your Honor:

This office has represented the Plaintiff, Lance Mincey, in this employment discrimination action against Defendants. We write to request a thirty (30) day stay of all deadlines in this case.

We have been advised that Plaintiff has an open bankruptcy case before Judge Cecelia G. Morris in the Southern District of New York, captioned In Re: Lance C. Mincey, Case No. 17-37177. There is a pending application in this bankruptcy matter for the Law Offices of William Cafaro to be retained by Plaintiff's estate to prosecute this discrimination case. See Exhibit 1. In that application, it has been requested that the Court approve the motion to employ the Law Offices of William Cafaro on June 14, 2021. *Id.* page 1. Accordingly, we ask that all deadlines in this case, including any future conferences or discovery deadlines/obligations, be stayed for the next thirty (30) days. This should provide enough time for the application in the bankruptcy matter to be granted and for this office to continue prosecuting this case.

The Court has not set any deadlines in this case, other than those associated with participating in mandatory mediation, which is scheduled for July 9, 2021. Defendants have served discovery requests on Plaintiff, and the responses are due later this month. We believe the mediation date should remain on the calendar since this office will likely be retained as counsel by then. As for Plaintiff's discovery responses and other discovery deadline, they should be stayed.

We will file a status report with the Court within thirty (30) days of today, or when we are retained by Plaintiff's estate, whichever is sooner. Earlier today, we reached out to Defendants' counsel for their input on our request, but we did not hear back from them.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/

By Louis M. Leon, Esq. (LL 2057)

108 West 39<sup>th</sup> Street, Suite 602

New York, New York 10018

[LLeon@cafaroeseq.com](mailto:LLeon@cafaroeseq.com)

Counsel's request for a 30 day stay of all deadlines in this case is GRANTED. Plaintiff's counsel shall file a status report with the Court within 30 days or when counsel is retained by Plaintiff's estate, whichever is sooner. SO ORDERED.

 6/11/2021